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ALEX TAVAREZ, OFFICE MANAGER

July 20, 2023

**Via-ECF:**

Honorable Gregory H. Woods  
Southern District of New York  
United States District Court  
Daniel Patrick Moynihan US Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: Emergency Request for Adjournment  
Zivkovic v. Valbella at the Park LLC  
Index No. 22-cv-07344-GHW  
Our File: F11300**

Dear Judge Woods:

We send this letter pursuant to Rule 1(E) of Your Honor's Individual Rules of Practice, and, as set forth below, we respectfully submit that this letter falls within the "emergency" exception to that Rule.

Approximately an hour and a half ago, our firm was contacted by Baker & Hostetler LLP, counsel for Rosey Kalayjian in the related matter entitled Zivkovic v. Laura Christy LLC, Index No. 17-cv-00553. Counsel advised that, due to a serious family emergency, Ms. Kalayjian cannot appear at tomorrow's phone conference, on behalf of Oak Grove Road LLC, in which she holds a 90% interest, or Valbella at the Park LLC (in which Oak Grove Road LLC holds a 50% interest).

Accordingly, based upon the foregoing, we respectfully request a brief adjournment of tomorrow's phone conference so that Ms. Kalayjian may appear next week as directed by Your Honor's Order dated July 17, 2023. Our office is available on Monday, July 24, 2023 at any time before 1:00 p.m. as well as any time after 11:00 a.m. on Tuesday July 25, 2023 and Wednesday July 26, 2023.

At approximately 1:30 p.m. today, I discussed this unforeseen emergency with Plaintiff's counsel, Lucas Buzzard, Esq., who advised me that the Plaintiff cannot consent to any adjournments or extensions of time.

Accordingly, I am now writing to the Court directly with said request. This is the first request for such relief.

Respectfully submitted,

/s/ Fred L. Seeman

Fred L. Seeman, Esq.

Cc: All counsel via electronic filing  
Cc: Clients via email